

APPENDIX A
Proposed Economic Loss Master Complaint

State:	Named Plaintiff(s) – Named Pharmacy Defendant¹ (PELMC ¶):	Claims under this state’s law should be dismissed with prejudice as to:
Alabama	Asha Lamy – Kroger (¶ 38) Sandra Kelly – None ² (¶ 48)	Walgreens, CVS, Walmart, Rite Aid, Express Scripts, OptumRx, Albertson’s, Humana
California	Jay Meader – CVS (¶ 39) Mark Hays – Express Scripts and CVS (¶ 53) Charlie Johnston – OptumRx (¶ 54) Merilyn Andre – Express Scripts and Sav-On (Albertson’s) (¶ 55)	Walgreens, Walmart, Rite Aid, Kroger, Humana

¹ Express Scripts, Inc. is not a pharmacy and does not dispense medications. However, the actual Express Scripts pharmacy entity that dispensed valsartan-containing products to named plaintiffs, if any, was likely owned and operated by a subsidiary of Express Scripts, Inc., and Express Scripts, Inc. has agreed to continue in this solely on behalf of the appropriate pharmacy entity or entities and will identify those entities at the appropriate time. All references to “Express Scripts” in the Opposition and both Appendixes are to the appropriate pharmacy entity or entities and not to Express Scripts, Inc.

² Where “None” is referenced, the named Plaintiff identified a non-Pharmacy Defendant dispensing pharmacy. Those pharmacies are Beulaville Pharmacy (Dudley, ¶ 19); Lonesome Pine Economy Drug (Mullins, ¶ 29); Costco (McLean, ¶ 37); Hannaford Food & Drug (Crocker, ¶ 42); Heights Specialty Pharmacy (Sims, ¶ 43); Main Line Health Pharmacy (Childs, ¶ 47); Emerging Home Care Pharmacy (Kelly, ¶ 48); and Smith Drug Co. (Cooper, ¶ 57).

State:	Named Plaintiff(s) – Named Pharmacy Defendant (PELMC ¶):	Claims under this state’s law should be dismissed with prejudice as to:
Connecticut ³	Peter O’Brien – CVS (¶ 56)	Walgreens, Walmart, Rite Aid, Express Scripts, Kroger, OptumRx, Albertson’s, Humana
Florida	Ron Molinaro – CVS (¶ 28) Estate of Elenora Deutenberg – CVS and Walgreens (¶ 41)	Walmart, Rite Aid, Express Scripts, Kroger, OptumRx, Albertson’s, Humana
Georgia	Lubertha Powell – Walgreens (¶ 33) Lawrence Edwards – CVS and Rite Aid (¶ 40)	Walmart, Express Scripts, Kroger, OptumRx, Albertson’s, Humana
Illinois	Marlin Anderson – CVS (¶ 45) Georgia Fatigato – Walgreens (¶ 51)	Walmart, Rite Aid, Express Scripts, Kroger, OptumRx, Albertson’s, Humana
Indiana	Leland Gildner – Kroger (¶ 22) Brian Wineinger – Walmart (¶ 35) Raleigh Wolfe – Walgreens (¶ 50)	CVS, Rite Aid, Express Scripts, OptumRx, Albertson’s, Humana
Kansas	Joseph Kessinger – CVS (¶ 32)	Walgreens, Walmart, Rite Aid, Express Scripts, Kroger, OptumRx, Albertson’s, Humana

³ Paragraphs relating to Dominic Stimma, a proposed class representative from Connecticut, were removed from the PELMC. *See* Redlined PELMC, Dkt. 1148-4, at PDF pgs. 31-32. Plaintiffs inadvertently kept reference to Stimma in the PELMC’s paragraph discussing the individuals who seek to represent Connecticut sub-classes. *See* PELMC ¶ 608.q at pg. 164.

State:	Named Plaintiff(s) – Named Pharmacy Defendant (PELMC ¶):	Claims under this state’s law should be dismissed with prejudice as to:
Kentucky	Glenda Cooper – None (¶ 57)	Walgreens, CVS, Walmart, Rite Aid, Express Scripts, Kroger, OptumRx, Albertson’s, Humana
Louisiana	Sandy Bell – CVS (¶ 14) Talsie Neal – Walmart (¶ 30)	Walgreens, Rite Aid, Express Scripts, Kroger, OptumRx, Albertson’s, Humana
Maine	Linda Crocker – None (¶ 42)	Walgreens, CVS, Walmart, Rite Aid, Express Scripts, Kroger, OptumRx, Albertson’s, Humana
Massachusetts	Veronica Longwell – CVS (¶ 26)	Walgreens, Walmart, Rite Aid, Express Scripts, Kroger, OptumRx, Albertson’s, Humana
Minnesota	Jennifer Johnson – Walmart (¶ 44)	Walgreens, CVS, Rite Aid, Express Scripts, Kroger, OptumRx, Albertson’s, Humana
Mississippi	Flora McGilvery – Walmart (¶ 27)	Walgreens, CVS, Rite Aid, Express Scripts, Kroger, OptumRx, Albertson’s, Humana
New Jersey	Marzanna Glab – CVS (¶ 36) Antoinette Sims – None (¶ 43) James Lawson – CVS (¶ 46)	Walmart, Rite Aid, Express Scripts, Kroger, OptumRx, Albertson’s, Humana

State:	Named Plaintiff(s) – Named Pharmacy Defendant (PELMC ¶):	Claims under this state’s law should be dismissed with prejudice as to:
	James Childs – None (¶ 47) Radhakrishna Shetty – Walgreens (¶ 49)	
New Mexico	Billy Joe Bruner – Walgreens (¶ 16)	CVS, Walmart, Rite Aid, Express Scripts, Kroger, OptumRx, Albertson’s, Humana
New York	Alphonse Borkowski – Rite Aid (¶ 15) Joseph Cacaccio – Rite Aid (¶ 18) John Duffy – Walgreens (¶ 20) Gerald Nelson – Rite Aid and CVS (¶ 31)	Walmart, Express Scripts, Kroger, OptumRx, Albertson’s, Humana
North Carolina	Gary Burnett – Walmart (¶ 17) Miranda Dudley – None (¶ 19)	Walgreens, CVS, Rite Aid, Express Scripts, Kroger, OptumRx, Albertson’s, Humana
Ohio	Dennis Kaplan – Rite Aid (¶ 24)	Walgreens, CVS, Walmart, Express Scripts, Kroger, OptumRx, Albertson’s, Humana
Pennsylvania	Lawrence Semmel – CVS (¶ 23)	Walgreens, Walmart, Rite Aid, Express Scripts, Kroger, OptumRx, Albertson’s, Humana
Texas	Eric Erwin – Walgreens (¶ 21) Jynona Gail Lee – Walmart (¶ 25) Brittney Means – Walgreens and CVS (¶ 52) Samuel Cisneros – Walmart (¶ 58)	Rite Aid, Express Scripts, Kroger, OptumRx, Albertson’s, Humana

State:	Named Plaintiff(s) – Named Pharmacy Defendant (PELMC ¶):	Claims under this state’s law should be dismissed with prejudice as to:
Virginia	Cheryl Mullins – None (¶ 29) Robin Roberts – Walgreens and Walmart (¶ 34) Mary McLean – None (¶ 37)	CVS, Rite Aid, Express Scripts, Kroger, OptumRx, Albertson’s, Humana